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*Counsel for Plaintiff, Milo H. Segner, Jr.
As Liquidating Trustee of the PR Liquidating Trust*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
PROVIDENT ROYALTIES, LLC, et al.,	§	Case No. 09-33886
	§	Chapter 11
Debtors.	§	(Jointly Administered)
MILO H. SEGNER, JR., as Liquidating Trustee of the PR Liquidating Trust, § Plaintiff,	§	
	§	
v.	§	Adversary Case No. 11-03385-HDH
	§	(previously pending in District Court
	§	as Case No. 3:12-CV-01318-B)
RUTHVEN OIL & GAS, LLC, WENDELL HOLLAND, THE WENDELL AND KARI HOLLAND TRUST, and CIANNA RESOURCES, INC. Defendants.	§	
	§	

**TRUSTEE'S SUGGESTIONS REGARDING
SCHEDULING IN ADVERSARY PROCEEDING**

TO THE HONORABLE HARLIN D. HALE, BANKRUPTCY JUDGE:

COMES NOW Milo H. Segner, Jr., as Liquidating Trustee of the PR Liquidating Trust,
Plaintiff, and would show the Court as follows:

1. The parties to this Adversary Proceeding previously represented to the Court that a schedule for pre-trial matters could be agreed to between them, subject to this Court's own schedule and approval.

2. The parties have conferred and have been unable to reach agreement. Accordingly, the Trustee submits his scheduling suggestions for the Court's consideration in advance of the scheduling conference.

3. By its last scheduling order, dated April 4, the District Court had set this matter for trial on September 15; the Trustee believes that remains a viable and feasible trial date.

4. The Trustee understands from Defendant's counsel that it would prefer to move the trial date to December 1, and possibly well beyond that date.

5. The Trustee would be willing to accommodate the Defendants by moving the trial date to October 15, but it believes that any delay beyond that time is wasteful of time and money. All deadlines can be comfortably met by all parties for a trial commencing at that time.

6. The Trustee attaches the following chart, showing the deadlines in existence under the District Court's April 4 order, and the dates which he would suggest that this Court adopt.

ACTION	April 4 Scheduling Order or FRCP Deadlines	Trustee's New Suggested Deadline
Plaintiffs to Designate Expert Witnesses and Produce Expert Reports	Closed ¹	Closed ¹
Defendants to Designate Expert Witnesses and Produce Expert Report	Closed ¹	Closed ¹
Fact Discovery Deadline	Closed ¹	Closed ¹
Plaintiffs to Designate Rebuttal Expert Witness and Produce Expert Report	Closed ¹	Closed ¹
Expert Discovery Deadline	Closed ¹	Closed ¹

¹ The parties have agreements on certain discovery matters that are not before the court at this time and, by agreement, are not subject to the discovery cut off dates.

Deadline for Parties to Amend Pleadings	May 16	June 5
Response Due to Trustee's MSJ ²	May 12	June 16
Reply Brief by Trustee on MSJ	May 22	June 26
Hearing on Defendant's Motion to Designate Roossien as Responsible Party	No hearing requested by Defendants	July 1
Daubert Motions and Dispositive Motions ³	July 1	July 11
Hearing on Trustee's MSJ	None	July 15
Response to <i>Daubert</i> Motions and Dispositive Motions	August 1	August 1
Mediation Deadline	July 1	August 7 ⁴
Identify Trial Witnesses	August 15	August 15
Joint Pre-Trial Order	August 15	August 15
Motions in Limine	September 1	September 1
Trial	September 15	September 15 ⁵

Dated: May 27, 2014

Respectfully submitted,
Milo H. Segner, Jr., as Liquidating Trustee
of the PR Liquidating Trust, Plaintiff

/s/ Michael R. Rochelle

One of His Counsel

Of Counsel:

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² Under Local Rule 7.1.e., Defendants' Response was due on May 12. Prior to Judge Boyle's order vacating all deadlines, the Trustee had agreed to extend the response deadline to June 2. The Trustee is willing to further extend the time to June 16, at Defendants' request.

³ If Daubert or dispositive motions are filed before the deadline, then responses are due in 24 days and replies are due 14 days after responses, consistent with the standard procedural rules.

⁴ Judge Ashworth, agreeable to both sides, is available to mediate if confirmed promptly.

⁵ Or such other date as may be directed by the Court.

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record for Defendants has elected to receive electronic service, which will accordingly be accomplished automatically upon the filing hereof.

/s/ Michael R. Rochelle
